

REMARKS

The Office Action dated July 19, 2006, has been received and carefully considered. In this response, claims 1 and 6 have been amended. Entry of the amendments to the claims 1 and 6 is respectfully requested. Reconsideration of the outstanding rejections in the present application is also respectfully requested based on the following amendments and remarks.

Statement of the Substance of the Interview

At the outset, the undersigned thanks the Examiner for the courtesies extended during the interview conducted on November 28, 2006, during which agreement was reached on amendments that would likely overcome the cited references. Applicant submits that the Examiner's Interview Summary accurately reflects the interview of November 28, 2006. However, rather than incorporating the limitations of claim 8 as discussed during the interview, Applicant has instead amended independent claims 1 and 6 using language that better recites the step of grouping by currency that Applicant and the Examiner agreed is likely to overcome the cited references.

I. THE ANTICIPATION REJECTION OF CLAIMS 1-13

On page 3 of the Office Action, claims 1-13 were rejected under 35 U.S.C. § 102(e) as being unpatentable over Potter (U.S. Patent No. 5,787,402). This rejection is hereby respectfully traversed.

Under 35 U.S.C. § 102, the Patent Office bears the burden of presenting at least a prima facie case of anticipation. In re Sun, 31 USPQ2d 1451, 1453 (Fed. Cir. 1993) (unpublished). Anticipation requires that a prior art reference disclose, either expressly or under the principles of inherency, each and every element of the claimed invention. Id. "In addition, the prior art reference must be enabling." Akzo N.V. v. U.S. International Trade Commission, 808 F.2d 1471,

1479, 1 USPQ2d 1241, 1245 (Fed. Cir. 1986), cert. denied, 482 U.S. 909 (1987). That is, the prior art reference must sufficiently describe the claimed invention so as to have placed the public in possession of it. In re Donohue, 766 F.2d 531, 533, 226 USPQ 619, 621 (Fed. Cir. 1985). Such possession is effected only if one of ordinary skill in the art could have combined the disclosure in the prior art reference with his/her own knowledge to make the claimed invention. Id.

As discussed during the interview of November 28, 2006, Applicant has amended the claims to recite a feature and functionality not recited in Potter or any of the other cited references. In particular, Applicant has amended each of the independent claims to recite the step of grouping foreign exchange transactions into sub-groups by currency. For example, Applicant has amended independent claim 1 to recite: “a first processor receiving a bulk file from the customer, the bulk file containing a plurality of funds transfer transactions, the first processor: (1) determining which of the plurality of funds transfer transactions is a foreign exchange transaction, (2) grouping the plurality of funds transfer transactions into funds transfer transactions requiring a foreign exchange operation, denoted as foreign exchange funds transfer transactions, and funds transactions not requiring a foreign exchange operation, denoted as same currency funds transfer transaction, and (3) grouping the foreign exchange funds transfer transactions into sub-groups based on currency.” Independent claim 6 has been amended in a similar fashion. Applicant respectfully submits this feature is fully supported by the specification. *See, e.g.*, Page 12, line 21 - Page 14, line 3.

Further, Applicant respectfully submits that Potter fails to teach or suggest any feature or functionality that groups foreign exchange funds transfer transactions into sub-groups based on currency. Rather, as discussed during the interview, Applicant respectfully submits that Potter

processes transactions on a one-to-one basis rather than on the sub-group by currency basis recited in the pending claims. That is, foreign exchange transactions are serially processed by Potter such that only one foreign exchange transaction is handled at a time. In contrast, the pending claims group foreign exchange transactions by currency in order to more efficiently process foreign exchange transactions that are in the same currency. *See, e.g.*, Page 13, lines 20-24. Accordingly, Applicant respectfully submits that independent claims 1 and 6 are allowable over the cited references.

Claims 2-5 and 7-13 are dependent upon independent claim 1 or 6. Thus, since independent claims 1 and 6 should be allowable as discussed above, claims 2-5 and 7-13 should also be allowable at least by virtue of their dependency on independent claim 1 or 6. Moreover, these claims recite additional features which are not claimed, disclosed, or even suggested by the cited references taken either alone or in combination. For example, claim 3 recites the system according to claim 1, further comprising: a link coupling the first processor to a system of the customer, wherein the customer system transmits the bulk file to the first processor. Applicant respectfully submits that none of the cited references, alone or in combination, teach or suggest the system of claim 1 further comprising a link coupling the first processor to a system of the customer, wherein the customer system transmits the bulk file to the first processor.

In view of the foregoing, it is respectfully requested that the aforementioned obviousness rejection of claims 1-13 be withdrawn.

II. CONCLUSION

In view of the foregoing, it is respectfully submitted that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed

telephone number, in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.

To the extent necessary, a petition for an extension of time under 37 CFR § 1.136 is hereby made.

Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account No. 50-0206, and please credit any excess fees to the same deposit account.

Respectfully submitted,

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APPENDIX A

1. **(Currently Amended)** A system for processing funds transfer transactions from a customer of a financial institution, the system comprising:

a first processor receiving a bulk file from the customer, the bulk file containing a plurality of funds transfer transactions, the first processor: (1) determining which of the plurality of funds transfer transactions is a foreign exchange transaction, ~~[[and]]~~ (2) grouping the plurality of funds transfer transactions into funds transfer transactions requiring a foreign exchange operation, denoted as foreign exchange funds transfer transactions, and funds transactions not requiring a foreign exchange operation, denoted as same currency funds transfer transaction, and (3) grouping the foreign exchange funds transfer transactions into sub-groups based on currency;

a second processor coupled to the first processor, the second processor receiving the same currency funds transfer transactions not requiring a foreign exchange operation from the first processor, the second processor generating first funds transfer instructions in response to the same currency funds transfer transactions;

a funds transfer processor coupled to the second processor, the funds transfer processor receiving the first funds transfer instructions from the second processor and executing the received first funds transfer instructions by transferring funds to a funds transfer processor of another financial institution; and

a trading processor coupled to the first processor, the trading processor receiving the sub-groups of foreign exchange funds transfer transactions based on currency from the first processor, the trading processor executing a foreign exchange operation in response to the received sub-groups of foreign exchange funds transfer transactions based on currency.

2. **(Original)** The system according to claim 1, wherein:

the trading processor is coupled to the second processor,
the trading processor forwarding to the second processor the foreign exchange funds transfer transactions and funds resulting from the foreign exchange operation,
the second processor generating second funds transfer instructions in response to the foreign exchange funds transfer transactions and funds resulting from the foreign exchange operation, and
the funds transfer processor receiving the second funds transfer instructions from the second processor and executing the received second funds transfer instructions by transferring funds to a funds transfer processor of another financial institution.

3. (Original) The system according to claim 1, further comprising:
a link coupling the first processor to a system of the customer, wherein the customer system transmits the bulk file to the first processor.
4. (Original) The system according to claim 3, further comprising:
a firewall disposed in the link coupling the first processor to the customer system.
5. (Original) The system according to claim 1, further comprising:
a market link from the trading processor to a foreign exchange market, wherein the trading processor receives real time foreign exchange rates over the link.
6. **(Currently Amended)** A method for processing funds transfer transactions from a customer of a financial institution using a processor-based system, the method comprising the steps of:
receiving a bulk file from the customer, the bulk file containing a plurality of funds transfer transactions;
determining which of the plurality of funds transfer transactions is a foreign

exchange transaction;

grouping the plurality of funds transfer transactions into funds transfer transactions requiring a foreign exchange operation, denoted as foreign exchange funds transfer transactions, and funds transfer transactions not requiring a foreign exchange operation, denoted as same currency funds transfer transactions;

grouping the foreign exchange funds transfer transactions into sub-groups based on currency;

executing a foreign exchange operation in response to each of the sub-groups foreign exchange funds transfer transactions based on currency to thereby generate available funds; and

settling the foreign exchange funds transfer transactions using the available funds.

7. (Original) The method according to claim 6, further comprising the steps of:
generating funds transfer instructions in response to the same currency funds transfer transactions; and

settling the same currency funds transfer transactions in response to the funds transfer instructions.

8. (Original) The method according to claim 6, further comprising the step of:
separating the bulk file into its component funds transfer transactions, the component funds transfer transactions including the foreign exchange funds transfer transactions and the same currency funds transfer transactions.

9. (Original) The method according to claim 6, further comprising the step of
sending an acknowledgments to the customer upon receipt of the bulk file and upon the settlement of the funds transfer transactions.

10. (Original) The method according to claim 6, further comprising the step of grouping the foreign exchange funds transfer transactions into batches according to a market in which the foreign exchange operation is to take place.

11. (Original) The method according to claim 10, further comprising the step of validating the format and contents of the batches.

12. (Original) The method according to claim 11, further comprising the step of validating the format and contents of the foreign exchange funds transfer transactions contained in the batches.

13. (Original) The method according to claim 10, further comprising the step of aggregating the foreign exchange funds transfer transactions contained in the batches according to a currency of the foreign exchange operation.